REMARKS

Claims 1-44 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 103(a) Rejections:

The Examiner rejected claims 1, 6-10, 15-19, 21-23, 28-32, 37-40 and 41-44 under 35 U.S.C. § 103(a) as being unpatentable over Takaoka et al. (U.S. Publication 2003/0085914) (hereinafter "Takaoka") in view of Grabauskas et al. (U.S. Publication 2004/0024887) (hereinafter "Grabauskas"). Applicants respectfully traverse this rejection for at least the following reasons.

Regarding claim 1, contrary to the Examiner's assertion, Takaoka in view of Grabauskas fails to teach or suggest a zone visualization mechanism configured to, in response to selection of a particular SAN object in the SAN, display one or more tables of zoning information for the selected SAN object, wherein the one or more tables of zoning information for the selected SAN object include one or more entries for each of the multiple zones of the SAN for which the selected SAN object is a member, wherein each of the one or more entries includes information describing a particular membership of the selected SAN object in the respective zone, as recited in Applicants' claim.

Takaoka teaches a graph interface for rendering *graphical* representations of the SAN components and their physical and logical interrelationships (Takaoka, paragraphs [0036] and [0102]). As noted in Applicants' previous response (Response to Final Action, filed February 20, 2008), the Takaoka reference does not teach displaying one or more tables of zoning information for a selected SAN object, nor does the Takaoka reference teach displaying one or more tables of zoning information that include an entry for each of multiple zones of the SAN of which the selected SAN object is a member, nor does the Takaoka reference teach each of the one or more entries including information describing a particular membership of the selected SAN object in the respective zone.

Similarly, Grabauskas teaches a graph interface for rendering *graphical* representations of SAN components, but fails to teach or suggest, even in view of Takaoka, displaying <u>tables of zoning information</u> as recited in Applicants' claim. For instance, regarding FIG. 3, cited by the Examiner, Grabauskas teaches a "graph interface 46 [that] provides methods, such as program functions and/or graphical user interface (GUI) controls, to allow a user to traverse the graph topology 44 to access information … and *render graphical representations* of the SAN components and their physical and logical interrelationship[s]" (emphasis added, Grabauskas, paragraph [0024]). Neither Takaoka nor Grabauskas, whether considered singly or in combination, teaches or suggests anything about displaying one or more tables of zoning information for the selected SAN object, as recited in claim 1.

Furthermore, the Examiner's combination of cited art clearly fails to teach or suggest anything about displaying tables of zoning information <u>for a selected SAN object</u>, where the tables of zoning information include one or more <u>entries</u> for <u>each of multiple zones</u> of the SAN <u>for which the selected SAN object is a member and where each of the entries includes information describing a particular membership of the selected SAN object in the respective zone</u>, as also recited in Applicants' claim.

The Examiner relies on FIGs. 3 and 8 of Grabauskas, citing paragraphs 27 and 55-58). However, the cited passages of Grabauskas describe example data formats for programmatically storing and analyzing information about SAN components. For example, Grabauskas teaches that "FIG. 3 illustrates one implementation off the graph topology 44 *data model*" and that a graph engine "generates a graph topology 44 including graph nodes providing *interrelated data structures* that store device information" (emphasis added, Grabauskas, paragraphs [0025-0025]). Grabauskas, whether considered singly or in combination with Takaoka, does not mention anything at all about displaying tables of zoning information as recited in Applicants' claim.

The Examiner argues that FIG. 8 of Grabauskas "shows the fields of a table included in the zone objects" (Action dated May 21, 2008, p. 3). Applicants' respectfully disagree with the Examiner's interpretation of Grabauskas, whether considered singly or in view of Takaoka. The Examiner further relies on FIG. 8 representing a "display table of zone information" (Action, p. 3). However, **FIG. 8 of Grabauskas does illustrate the "fields of a table" or a "display table of zone information" as incorrectly suggested by the Examiner.** Instead, FIG. 8 illustrates a portion of the data fields of a programming object used to store information in Grabauskas' graph interface. There is nothing mentioned in Grabauskas that indicates that the data illustrated in FIG. 8, or any other data in Grabauskas system, is included in any *displayed tables* of zoning information, as incorrectly suggested by the Examiner. Instead, Grabauskas is clearly describing a particular data format for programmatically storing and analyzing information about SAN components.

For example, Grabauskas teaches, at the Examiner's cited passage, that FIG. 8 illustrates fields included in the zone objects 110a ... 110n." Elsewhere (paragraph [0027]) Grabauskas teaches that the zone objects 110a ... 110n are part of the graph topology 44 shown in FIG. 3. As noted above, Grabauskas further teaches that the graph topology 44 is a programmatic data model, not a display table of zone information, as the Examiner contends.

Applicants are not arguing that the data model described by Grabauskas does not include information about SAN components. Applicants are arguing that Grabauskas in view of Takaoka does not teach or suggest displaying tables of zoning information for a selected SAN object, where the tables of zoning information include one or more entries for each one of multiple zones of the SAN of which the selected SAN object is a member and where each of the entries includes information describing a particular membership of the selected SAN object in the respective zone, as recited in Applicants' claim.

The Examiner's combination of Takaoka and Grabauskas would not result in a system including all the limitations recited in Applicants' claim. As noted above, neither

Takaoka nor Grabauskas, mentions anything about displaying tables of zone of information, as recited in claim 1. The Examiner has not cited any art that teaches or suggests displaying one or more tables of zoning information for a selected SAN object, as specifically recited in Applicants' claim.

Furthermore, the Examiner stated reason for combining Takaoka and Grabauskas would not cause one to modify Takaoka or Grabauskas, or any combination of Takaoka and Grabauskas, to include the specific limitations recited in claim 1. The Examiner asserts, "a person having ordinary skill in the art would readily recognized the desirability and advantages of modifying Takaoka … in order to determine the zone information for particular SAN objects in a hierarchical tree display that is easy to navigate" (Action, p. 3). However, as noted by the Examiner (Action, p. 2), Takaoka's system already includes the ability to generate and determine zones within a SAN fabric, that does not include the ability to display one or more tables of zoning information for a selected SAN object, as admitted by the Examiner. In fact, the Examiner clearly states that Takaoka's system includes the ability to indicate that "the SAN object is a member of the zone" (Action, p. 2). Thus, one desiring to "determine the zone information for particular SAN objects" would not have to modify Takaoka. Thus, the Examiner's stated reason to combine the references is not relevant. Moreover, even if one were to modify Takaoka in view of Grabauskas, the resulting system would not include "a display table of zone information" as the Examiner incorrectly contends, because, as noted above, Grabauskas does not teach or suggest (even in view of Takaoka) anything about displaying tables of zoning information, as recited in Applicants' claim. Even if one were to modify Takaoka to include Grabauskas' particular data model the resulting system would not include displaying tables of zoning information as recited in detail in Applicants' claim.

Thus, the rejection of claim 1 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks also apply to claims 10, 19, 23 and 32.

The Examiner rejected claims 2, 4, 5, 11, 13, 14, 20, 24, 26, 27, 33, 35 and 36 under 35 U.S.C. § 103(a) as being unpatentable over Takaoka in view of Grabauskas and further in view of Anslow et al. (U.S. Publication 2003/0130821) (hereinafter "Anslow"), and claims 3, 12, 25 and 34 as being unpatentable over Takaoka in view of Grabauskas and further in view of Bramhall et al. (U.S. Publication 2003/0195956) (hereinafter "Bramhall"). Applicants respectfully traverse these rejections for at least the reasons presented above regarding their respective independent claims.

Further regarding claim 2, Takaoka in view of Grabauskas and Anslow fails to teach or suggest **wherein the one or more tables of zoning information indicate logical zone membership for the selected SAN object, wherein a SAN object is a logical member of a zone via relationship of the SAN object to one or more other SAN objects that are physical members of the zone,** as recited in Applicants' claim. The Examiner argues, "Grabauskas further discloses that the one or more tables of zoning information indicates logical zone membership for the selected SAN object", and further asserts that FIG. 8 of Grabauskas shows "the table with the logical zone membership (i.e., zone name) for the selected SAN object" (Action, p. 5). However, as noted above regarding the rejection of claim 1, Grabauskas, even in view of Takaoka and Anslow, does not teach or suggest *tables of zoning information indicating logical zone membership.* Claim 2, clearly recites that a SAN object is a logical member of a zone via relationship of the SAN object to one or more other SAN objects that are physical members of the zone. In contrast, Grabauskas teaches, regarding FIG. 8, zone objects (110a ... 110n) that provide references to switch ports in a zone of a fabric (Grabauskas, paragraph [0055]). Grabauskas does not mention anything about the zone name included in a zone object, as relied on by the Examiner, indicates *logical zone membership* for a selected SAN object. Instead, Grabauskas teaches only that the Zone Name and Other Info 214 "[p]rovides a name or identifier of the zone in the fabric and may include additional information, such as a reference to the fabric object 102a ... 102n containing the zone" (Grabauskas, paragraph [0058]). Grabauskas does not mention anything about Zone Name and Other Info 214 indicating anything about zone membership and clearly

fails to teach or suggest, even in view of Takaoka and Anslow, indicating *logical zone membership* of a selected SAN object, as recited in Applicants' claim.

The Examiner also relies on Anslow to teach that "logical and physical device relationships can be shown in the displayed zoning information, citing paragraph [0036]. In the citations provided by the Examiner and elsewhere, Anslow refers to logical relationships (although Applicants note that Anslow never <u>specifically</u> describes the notion of logical zone membership as recited in claim 2). <u>However, Anslow, even in view of Takaoka and Grabauskas, does not teach or suggest all of the limitations as recited in amended claims 1 and 2 of the instant application.</u>

Thus, for at least the reasons above, the rejection of claim 2 is not supported in the cited art and removal thereof is respectfully requested. Similar remarks also apply to claims 11, 20, 24 and 33.

In regard to claim 4, the cited art does not teach or suggest **wherein, for each zone of the SAN of which the selected SAN object is a member, the one or more tables of zoning information include a separate entry corresponding to each** other **SAN object through which the selected SAN object is a logical <u>or physical</u> member of the zone, wherein a SAN object is a logical member of a zone via relationship of the SAN object to other SAN objects that are physical members of the zone,** as recited in amended claim 4.

The Examiner relies on Grabauskas, citing FIG. 3 and paragraph [0055], arguing, "where the SAN object [100] can have displayed each Fabric Object [102] and their separate zone information [110], and each zone information holds its own table of zoning information" (Action, p. 6). However, as described above regarding claim 1, the fields described in paragraph [0055] of Grabauskas do not describe displayed tables of zoning information. Instead, the fields on which the Examiner relies are data fields in a programming object used to store and analyzing SAN objects (Grabauskas, paragraphs,

[0024-0025], [0027-0028] and [0055-0058]). Thus, the Examiner's cited art, alone or in combination, does not teach all of the limitations as recited in amended claim 4.

As such, the rejection of claim 4 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks also apply to claims 13, 26, and 35.

Applicants also assert that numerous other ones of the dependent claims recite further distinctions over the cited art. However, since the rejections have been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5760-15500/RCK.

Respectfully submitted,

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Date: August 21, 2008